

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN
DISASTER SITE LITIGATION

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ROLANDO PELAEZ AND MONICA VILLAMARIN,

Plaintiff(s), Index No.: 07cv4507

-against-

NOTICE OF ADOPTION

1:21-MC-00102-AKH

40 BROAD, LLP, 55 WATER STREET
CONDOMINIUM, 75 BROAD LLC, 90 CHURCH
STREET LIMITED PARTNERSHIP, AIG
REALTY, INC., ALAN KASMAN DBA KASCO,
AMBIENT GROUP, INC., AMERICAN
INTERNATIONAL GROUP, INC., AMERICAN
INTERNATIONAL REALTY CORP., ANN
TAYLOR STORES CORPORATION, BANK OF
NEW YORK, BATTERY PARK CITY
AUTHORITY, BELFOR USA GROUP, INC., BFP
ONE LIBERTY PLAZA CO., LLC.,
BLACKMON-MOORING-STEAMATIC
CATASTROPHE, INC. D/B/A BMS CAT, BOSTON
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, LP, BROOKFIELD PARTNERS,
LP, BROOKFIELD PROPERTIES
CORPORATION, BROOKFIELD PROPERTIES
HOLDINGS INC., CAPITAL PROPERTIES, INC,
CB RICHARD ELLIS, CITIGROUP
CORPORATE REALTY SERVICES, DEUTSCHE
BANK, ENVIROTECH CLEAN AIR, INC.,
GENERAL RE SERVICES CORP., GPS
ENVIRONMENTAL CONSULTANTS, INC.,
HILLMAN ENVIRONMENTAL GROUP, LLC.,
INDOOR ENVIRONMENTAL TECHNOLOGY,
INC., JACK RESNICK & SONS INC, JEMB
REALTY CORP., JONES LANG LASALLE,
KASCO RESTORATION SERVICES CO.,
LIGHTHOUSE REAL ESTATE LLC, MERRILL
LYNCH & CO, INC., NATIONAL
ASSOCIATION OF SECURITIES DEALERS,
INC., NEW LIBERTY PLAZA LP, NEW WATER
STREET CORP., NEW YORK CITY ECONOMIC
DEVELOPMENT CORPORATION, NEW YORK
CITY INDUSTRIAL DEVELOPMENT AGENCY,

NEW YORK CITY INDUSTRIAL
 DEVELOPMENT CORPORATION, NOMURA
 HOLDING AMERICA, INC., NOMURA
 SECURITIES INTERNATIONAL, INC., ONE
 LIBERTY PLAZA, RESNICK WATER STREET
 DEVELOPMENT CO, RICHARD WINNER,
 STATE STREET BANK & TRUST ETC,
 STRUCTURE TONE (UK), INC., STRUCTURE
 TONE GLOBAL SERVICES, INC., THE BOARD
 OF MANAGERS OF THE ONE LIBERTY
 PLAZA CONDOMINIUM (CONDO #1178), THE
 ONE LIBERTY PLAZA CONDOMINIUM
 (CONDO #1178), TOSCORP INC., TRINITY
 CENTRE, LLC, TUCKER ANTHONY, INC., US
 GOVERNMENT, VERIZON
 COMMUNICATIONS, INC., VERIZON NEW
 YORK, INC, WALL STREET LLC, WESTON
 SOLUTIONS, INC., WFP ONE LIBERTY PLAZA
 CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP,
 CORP., WFP TOWER A CO., WFP TOWER A
 CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP
 TOWER B CO. G.P. CORP., WFP TOWER B
 HOLDING CO., LP, WFP T, ET AL,

Defendant(s).

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C O U N S E L O R S :

PLEASE TAKE NOTICE that Defendant, HILLMANN ENVIRONMENTAL GROUP, LLC, (hereinafter HILLMANN) as and for it's response to the allegations set forth in the Complaint by adoption or Check-Off Complaint related to the Master Complaint filed herein and applicable to the above captioned matter hereby adopts all of the responses and all of the affirmative defenses contained in the Answer to the Master Complaint dated, filed and served August 2, 2007, *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein. Defendant, HILLMANN, also adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross claim against any and all co-defendants.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, Defendant, HILLMANN, demands judgment dismissing the above captioned action against it along with the costs and disbursements of this action.

Dated: White Plains, New York
September 11, 2007

Yours, etc.,

SAM ROSMARIN, PLLC



By: _____
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AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF WESTCHESTER:

Cristina A. Villani, being duly sworn, says, I am not a party to the action, am over 18 years of age and reside at White Plains, New York.

On September 11th, 2007 I filed with the USDC pursuant to ECF filing instructions under Case No.: 1:21-mc-00102-AKH and emailed a true copy of the annexed DEFENDANT HILLMAN ENVIRONMENTAL GROUP LLC NOTICE OF ADOPTION by electronic mailing the same to the following parties at their last known electronic mailing address:

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All parties indicated on the
SERVICE RIDER



Cristina A. Villani

Sworn to before me this
11th day of September 2007



Charlene S. Rogers
Notary Public
No. 01RO 4703494
Qualified in Westchester County
Commission Expires 11/30/09